

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA	*	CRIMINAL NO.: 11-168
v.	*	SECTION: "J"
VANESSA JONES	*	

* * *

FACTUAL BASIS

Should this matter have gone to trial, the Government would have proved, through the introduction of competent testimony and admissible tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the Bill of Information now pending against the defendant, **VANESSA JONES**. The defendant has agreed to plead guilty as charged in the Bill of Information charging her with making false statements to an agency of the United States in violation of Title 18, United States Code, Section 1001.

On or about September 6, 2006, **VANESSA JONES** applied for a Louisiana Road Home ("Road Home") grant to obtain funds for alleged repairs to Katrina-related damages sustained by the property located at 321 Fortier Street, Kenner, LA 70062, in the Eastern District of Louisiana. In her application, **JONES** said that the property located at 321 Fortier Street, Kenner LA 70062 was her primary residence on August 29, 2005, when Hurricane Katrina made landfall in the Eastern District of Louisiana. A certified copy of defendant's Road Home application and attachments would be offered as evidence at trial.

A Kenner Police Department detective would testify that on April 7, 2004, he interviewed **JONES** in reference to her complaint of contractor fraud on her property located at 321 Fortier Street in Kenner. **JONES** told the detective that a contractor demolished her home at 321 Fortier Street in Kenner and never completed the job of rebuilding her home.

If called to testify, A.W., an Assistant District Attorney with Jefferson Parish, would state that the defendant, **VANESSA JONES**, met with A.W. on June 26, 2007 concerning a legal complaint of contractor fraud related to her property located at 321 Fortier Street, Kenner, Louisiana. **JONES**, admitted to A.W. that a contractor had demolished **JONES'** home located at 321 Fortier Street on September 13, 2000 pursuant a contractual agreement to remodel the home and a new home had not been built on the property prior to Hurricane Katrina.

If called to testify, L.S., who has resided on Fortier Street in Kenner since before August 29, 2005, would state that the defendant, **VANESSA JONES**, did not reside at 321 Fortier Street at the time of Hurricane Katrina because **JONES'** home had been demolished by contractors before the storm and the contractors had not rebuilt **JONES'** home. L.S. would testify that at the time of Hurricane Katrina, **JONES'** residence was framed with a roof, but had no siding on the outside of the residence. L.S. would also testify that **JONES** was living on Clay Street in Kenner on or about August 29, 2005.

A utility billing superintendent from Jefferson Parish Department of Water and Public Works would testify that there was no account for water service in anyone's name at **JONES'** property located at 321 Fortier Street in Kenner from September 22, 2000 through December 5, 2005.

On April 24, 2007, **JONES** signed a Road Home Grant Recipient Affidavit whereby **JONES** certified and declared under oath that at the date of Hurricane Katrina, the property located at 321

Fortier Street, Kenner Louisiana, 70062 was her primary residence. A certified copy of the executed Affidavit would be offered as evidence at trial.

A Special Agent of the U.S. Department of Homeland Security, Office of Inspector General, (HUD-OIG) would testify that on May 3, 2007, **VANESSA JONES** received a Louisiana Road Home grant in the amount of \$90,390 for repairs to property located at 321 Fortier Street, Kenner Louisiana. The Special Agent would also testify that **JONES** received an Additional Compensation Grant (“ACG”) from the Louisiana Road Home Program in April 2010 the amount of \$59,544 for the same property located at 321 Fortier Street, Kenner Louisiana. **JONES** received a total grant of \$149,934 from the Louisiana Road Home program.

On September 22, 2010, **VANESSA JONES** was interviewed by Special Agents of The Department of Housing and Urban Development, Office of Inspector General, regarding her Road Home application. The defendant, **VANESSA JONES**, admitted that she was living at 727 Clay Street in Kenner, Louisiana at the time of Hurricane Katrina and was not residing at 321 Fortier Street in Kenner Louisiana until August 2008.

A Special Agent of HUD-OIG would testify that HUD is a federal agency and that as a result of legislation passed by Congress, funds were appropriated to HUD for a Community Development Block Grant (“CDBG”) for Louisiana Hurricane victims. The purpose of CDBG was to assist and aid owners of property damaged or destroyed by Hurricanes Katrina and Rita in September of 2005. The grant money was disbursed under the program known as the Louisiana Road Home Program (the “Program”). HUD prepared the rules and regulations governing the disbursement of grant money through the State of Louisiana, and the State, through the Office of Community Development,

Division of Administration, contracted with ICF International, Inc. to administer the Program and the federal grant funds.

A Special Agent of HUD-OIG would further testify that the two major requirements for receiving Louisiana Road Home grant money was the applicant must have been the owner of the damaged property on August 29, 2005 and the property was the primary residence of the applicant on August 29, 2005.

Both the Government and the defendant, **VANESSA JONES**, do hereby stipulate and agree that the above facts set forth a sufficient factual basis for the crime to which the defendant is pleading guilty and that the Government would have proven these facts beyond a reasonable doubt at trial.

VANESSA JONES
Defendant

DATE

MALCOLM B. ROBINSON, JR.
Counsel for Defendant

DATE

JULIA K. EVANS
Assistant United States Attorney

DATE